

# **EXHIBIT L**

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**From:** [Anthony DeMint](#)  
**To:** [Ellenbogen, Bennett](#)  
**Cc:** [Fischer, Howard](#)  
**Subject:** RE: SEC v. Premier Holding Corp., et al  
**Date:** Tuesday, October 09, 2018 7:23:27 PM

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Randall Letcavage will be the 30(b)(6) witness.

Best,

**ANTHONY N. DEMINT**  
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**From:** Ellenbogen, Bennett [mailto:[EllenbogenB@SEC.GOV](mailto:EllenbogenB@SEC.GOV)]  
**Sent:** Tuesday, October 09, 2018 11:26 AM  
**To:** Anthony DeMint  
**Cc:** Fischer, Howard  
**Subject:** RE: SEC v. Premier Holding Corp., et al

Anthony- I still haven't heard from you re 30(b)(6) witnesses. Please let me know ASAP.

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**From:** Anthony DeMint [mailto:[anthony@demintlaw.com](mailto:anthony@demintlaw.com)]  
**Sent:** Wednesday, September 26, 2018 4:07 PM  
**To:** Ellenbogen, Bennett  
**Subject:** RE: SEC v. Premier Holding Corp., et al

I will have that for you by end of the week.

Best,

**ANTHONY N. DEMINT**  
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**From:** Ellenbogen, Bennett [mailto:[EllenbogenB@SEC.GOV](mailto:EllenbogenB@SEC.GOV)]  
**Sent:** Wednesday, September 26, 2018 1:01 PM  
**To:** anthony@demintlaw.com  
**Subject:** SEC v. Premier Holding Corp., et al

Anthony:  
Any update on who the 30(b)(6) witness(es) will be and whether the date on the subpoena, October 18, is good for the deposition?

Thanks,  
Ben

Bennett Ellenbogen  
S.E.C.

**From:** Anthony DeMint  
**To:** Fischer, Howard  
**Cc:** Ellenbogen, Bennett  
**Subject:** Re: 30(b)(6) deposition  
**Date:** Friday, October 12, 2018 6:13:35 PM

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Gentlemen,

I was just informed my client is unavailable the morning of the 18th. We will need to reschedule. I am getting a few dates from him over the weekend so we can firm up on Monday.

Best regards,

Anthony N. DeMint  
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On Oct 11, 2018, at 12:33 PM, Fischer, Howard <[FischerH@SEC.GOV](mailto:FischerH@SEC.GOV)> wrote:

Anthony:

We'd like to start the 30(b)(6) deposition at 9:30 on Thursday, October 18.

Please confirm.

Thanks.

Howard Fischer  
Senior Trial Counsel  
Securities & Exchange Commission  
Brookfield Place, 200 Vesey Street  
Room 17-216  
New York, NY 10281.  
Tel: (212) 336-0589  
Cell: (917) 226-1943  
Fax: (703) 813-9490  
FischerH@SEC.gov

**From:** Fischer, Howard  
**To:** Anthony DeMint ([anthony@demintlaw.com](mailto:anthony@demintlaw.com))  
**Cc:** Ellenbogen, Bennett  
**Subject:** October 30 Letter and open discovery items: deposition and Absher documents.  
**Date:** Wednesday, October 31, 2018 1:55:00 PM

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Anthony:

I am following up on our letter of yesterday, and our phone call of earlier today, regarding dates for the 30(b)(6) deposition of Mr. Letcavage and the issues brought to the forefront during Ms. Absher's October 18, 2018 deposition. As we are sure you are well aware, the Local Rules require us to meet and confer prior to us making a motion to compel, and in order to do that we would need from you a time in which to discuss these open issues. Our inability to get a response from you hampers those efforts.

As we said in the message we left for you earlier today, we can be available for Mr. Letcavage's deposition in Los Angeles on either December 6 or 7, 2018. Please confirm in writing that Mr. Letcavage will come to our Los Angeles office on one of those dates for the 30(b)6) deposition. Should we not hear back from you by Friday we reserve all rights, including to make a motion to compel for the relief set out in our October 30, 2018 letter, as well as to obtain costs.

Regards,

Howard

Howard Fischer  
Senior Trial Counsel  
Securities & Exchange Commission  
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Fax: (703) 813-9490  
[FischerH@SEC.gov](mailto:FischerH@SEC.gov)

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**From:** Anthony DeMint  
**To:** Fischer, Howard  
**Cc:** Ellenbogen, Bennett  
**Subject:** Re: October 30 Letter and open discovery items: deposition and Absher documents.  
**Date:** Thursday, November 01, 2018 5:44:46 PM

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Great 9:30 it is.

I would like to have a call early next week to discuss the other items in your letter. My morning on Tuesday is fairly wide open. Let me know if Tuesday morning is good and a time.

Best,

Anthony N. DeMint  
Attorney at Law  
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On Nov 1, 2018, at 2:22 PM, Fischer, Howard <[FischerH@SEC.GOV](mailto:FischerH@SEC.GOV)> wrote:

Anthony:

Terrific. Let's schedule the Letcavage 30(b)(6) deposition for 9:30 am on December 6<sup>th</sup>.

Do you have a response on the other issues raised in our October 30, 2018 letter, or should we schedule a call in the next day or so to discuss?

Regards,

Howard

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**From:** Anthony DeMint [<mailto:anthony@demintlaw.com>]  
**Sent:** Thursday, November 01, 2018 4:44 PM  
**To:** Fischer, Howard  
**Cc:** Ellenbogen, Bennett  
**Subject:** Re: October 30 Letter and open discovery items: deposition and Absher documents.

Howard,

December 6th is acceptable.

Best,

Anthony N. DeMint  
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On Oct 31, 2018, at 10:55 AM, Fischer, Howard <[FischerH@SEC.GOV](mailto:FischerH@SEC.GOV)> wrote:

Anthony:

I am following up on our letter of yesterday, and our phone call of earlier today, regarding dates for the 30(b)(6) deposition of Mr. Letcavage and the issues brought to the forefront during Ms. Absher's October 18, 2018 deposition. As we are sure you are well aware, the Local Rules require us to meet and confer prior to us making a motion to compel, and in order to do that we would need from you a time in which to discuss these open issues. Our inability to get a response from you hampers those efforts.

As we said in the message we left for you earlier today, we can be available for Mr. Letcavage's deposition in Los Angeles on either December 6 or 7, 2018. Please confirm in writing that Mr. Letcavage will come to our Los Angeles office on one of those dates for the 30(b)6) deposition. Should we not hear back from you by Friday we reserve all rights, including to make a motion to compel for the relief set out in our October 30, 2018 letter, as well as to obtain costs.

Regards,

Howard

Howard Fischer  
Senior Trial Counsel  
Securities & Exchange Commission  
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[FischerH@SEC.gov](mailto:FischerH@SEC.gov)

**From:** Fischer, Howard  
**To:** Anthony DeMint ([anthony@demintlaw.com](mailto:anthony@demintlaw.com))  
**Cc:** Ellenbogen, Bennett  
**Subject:** Our discussion earlier today  
**Date:** Wednesday, November 07, 2018 3:47:00 PM

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Anthony:

It was a pleasure speaking with you earlier. I wanted to confirm several items.

First, the 30(b)(6) deposition of Randall Letcavage will be held at our Los Angeles office, at 9:30 am PST on Thursday, December 6.

Second, with respect to our letter of October 30, 2018, you have advised us that you are in the process of responding to the requests set forth therein. You have advised us that your current understanding is that Premier does not and has not maintained a centralized document depository or keep its emails on one centralized server. You have also advised us that you understand that Premier emails were archived on individual machines. (Please advise us if that understanding changes.) Consequently, your client is looking through various sources to obtain responses to our follow-ups from Ms. Absher's testimony. Furthermore, when we asked if you had looked to determine whether Ms. Absher's computer was still present in the office, you said you would check.

Third, we agreed that we would have a follow up call or email next Tuesday, November 13, to check the status of the above.

Fourth, we asked you if you would agree that, to the extent the parties could not consensually resolve discovery disputes going forward, rather than following the procedures set out in Local Rule 37 we resort instead to the procedures set out in Judge Magistrate Scott's Individual Rules. Local Rule 37 can be found at:

[https://www.cacd.uscourts.gov/sites/default/files/documents/2018%20June%20LRs%20Chap%201\\_0.pdf](https://www.cacd.uscourts.gov/sites/default/files/documents/2018%20June%20LRs%20Chap%201_0.pdf)

The Magistrate's abbreviated procedure can be found at:  
<https://www.cacd.uscourts.gov/honorable-karen-e-scott>

Regards,

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**From:** [Anthony DeMint](#)  
**To:** [Fischer, Howard; Ellenbogen, Bennett](#)  
**Cc:** [dcsheetz@aol.com](#)  
**Subject:** Premier 30(B)(6) Deposition  
**Date:** Tuesday, December 04, 2018 1:33:05 PM

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Gentlemen,

I have been informed Premier has designated Megan Samson as its 30(B)(6) witness, not Randall Letcavage. Unfortunately, Ms. Samson's mother just passed away and she is out of the state attending to family matters. She will return to work on or about December 12<sup>th</sup>, at which time I can meet with her to discuss acceptable dates for the deposition.

Additionally, given Ms. Samson's situation I have been unable to meet with her regarding your purported open discovery items. I kindly request an extension of time from December 7<sup>th</sup> to December 21<sup>st</sup> to allow Ms. Samson and I to meet and discuss the discovery issues.

Best personal regards,

**ANTHONY N. DEMINT**  
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